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IDAHO PUBLIC UTILITIES COMMISSION

March 20, 2014

Weldon Stutzman
Idaho Public Utilities Commission
472 West Washington
Boise, ID 83702-5983

PAP-T-14-01

Dear Weldon,

As a follow-up to our various conversations, outlined below is a proposal for providing the monthly Idaho Performance Assurance Plan (PAP) reports on an ongoing basis:

Previously the PAP report included an aggregate CLEC payment report that was not confidential and was filed electronically by email each month with the IPUC. In addition, a summary of payments made to individual CLECs in Idaho was emailed separately to Staff with the term "Confidential" in the subject matter line of the email. Reports pertaining to aggregate performance, e.g. performance indicators missed etc., were not filed with the IPUC but were available at a website. However, with the approval of certain changes to the PAP in Order No. 32899, Docket No. QWE-T-08-04, monthly reports to be provided the state commissions will now consist of the following:

- **Aggregate payment report** - Not confidential (The report is 2 months in arrears. For example the March 2014 report will contain the January 2014 results.)
- **CLEC-specific payment report** - Confidential (The report is 2 months in arrears. For example the March 2014 report will contain the January 2014 results.)
- **Aggregate performance report** – Not confidential (The report contains 13 months of aggregate data. For example the March 2014 report will contain 13 months of aggregate performance data up through February 2014)
- **CLEC-specific performance report** – Confidential (This report contains one month of CLEC-specific data. For example, the March 2014 report will provide the January 2014 results.)

The filing of these reports requires certain changes to our reporting process in Idaho. First, it should be noted that the performance reports, which have not previously been filed in Idaho, are voluminous. We believe that most efficient and useful form of submission for these reports is in electronic format, which will more readily allow review of spread sheets that cannot realistically be printed out on one page.

The second issue raised by these changes is the requirement to file CLEC-specific information on payments and performance. CLEC-specific information is confidential because it potentially discloses information about the individual CLEC's business expansion, technologies chosen to serve its customers etc. CenturyLink proposes that these reports be filed in an electronic format but, due to the confidential nature of information contained in them, we do not believe that an email filing is appropriate. Instead CenturyLink proposes providing a compact disc containing these reports that will allow the IPUC and its Staff to better maintain confidentiality while reviewing the information.

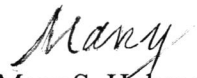
In addition, since each of the four reports is required each month, CenturyLink believes it would be useful to supply all the information for each month's reports at the same time and in the same format. Therefore, CenturyLink proposes providing two separate discs: one containing the aggregate payment report and the aggregate performance report (both non-confidential) and a second disc containing the CLEC-specific payment and performance reports. This second disc will be clearly marked "CONFIDENTIAL."

Working with you and the Staff we understand that a new acronym and case have been created allowing CenturyLink to file the new report information under "PAP-T-14-01." We appreciate this accommodation, which will allow all of us to keep better track of these filings.

Our initial filing will be accompanied by an Attorney's Certificate for the CLEC-specific payment and performance reports attesting to their confidentiality. This Certificate will also reference the continuing obligation under the PAP to file such information each month. Based on our conversations we understand that this process will be sufficient for maintaining the confidentiality of such CLEC-specific information on a going forward basis. To preserve the integrity of this process, Staff will, of course, be in position to review each filing marked as confidential to assure itself and the Commission that the information is appropriately designated.

Thank you for your cooperation in developing these procedures. Please feel free to contact me if you have any questions or concerns.

Very truly yours,


Mary S. Hobson

Attorney for CenturyLink QC